

## **REMARKS/ARGUMENTS**

### **Claim Objection**

The Action objects to claim 19, because claim 19 has mistakenly claimed dependency from Claim 15. Claim 19 has been amended to properly depend from Claim 16. Accordingly, Applicant respectfully requests that the objection to claim 19 be withdrawn.

### **Claim Rejections Under §102**

The Action rejects claims 1-6 and 10-12, 16-21, 25-27, 31-32, 39-40, and 44 as being anticipated by Brandon (U.S. Patent 6,385,568). Applicant has cancelled claim 2 and incorporated its limitations into claim 1. Applicant has cancelled claim 17 and incorporated its limitations into claim 16. Accordingly, the rejection has been rendered moot as to these claims, and Applicant respectfully requests that it be withdrawn.

Applicant, respectfully, traverses the rejection of amended claims 1, 3-6, and 10 because Brandon fails to teach suggest, or disclose every element of the claims as amended.

In order for the claims 1, 3-6, and 10 to be anticipated by Brandon, Brandon must teach and every element as set forth in the claims. Moreover, Brandon must teach the identical invention in as much detail as is contained in the claims (see MPEP §2131).

The inventions disclosed and claimed in the present application are directed to the translation of source text in an email from an original text to a translated text. Specifically, the user is provided translation options *prior to the translation*, which allows modification to the text prior to translation, such as spell checking or language options given to the translation procedure. The support for the text modification options

can be seen in Figure 4 where several radio buttons offer the user a number of language options to be specified in the translation procedure. Furthermore, a push button is given to offer the user a spell checking option. Accordingly, Brandon does not teach the “providing one or more pre-translation text modification options for selection by a user” as taught in amended claim 1.

Brandon, on the other hand, teaches a system and method for operator-assisted translation of source text, wherein the user is offered translation options only after or during the translation process. Specifically, e.g., if a word does not exist in a translation database, then a user is offered choices to deal with this situation. The choices offered by Brandon occur *after the translation process has begun*. Such an offering of choices would not make sense if it occurs before the translation process. In essence, Brandon teaches a method of manually correcting the word-by-word translation when the system is unable to determine the meaning of a word, by offering choices to the user.

Because Brandon fails to teach, suggest or disclose every limitation of amended independent claim 1, Applicant respectfully requests withdrawal of the rejection to this claim. Applicant further request the rejections as to claims 3-6, and 10 be withdrawn since these claims depend from amended independent claim 1.

In regard to amended independent claims 11 and 16, Applicant submits that since claims 11 and 16, as amended, recite the method steps of translating text including the step, “providing one or more pre-translation text modification options for selection by a user”, it is allowable over the art of record for at least the reasons given above for claim 1. Applicant respectfully requests withdrawal of the rejection to these claims. Applicant further requests the rejections as to claims 12, 18-21, and 25 be withdrawn, since these

claims depend from either independent claim 11 or independent claim 16, which are themselves allowable over the art of record.

In regard to amended independent claim 26, Applicant submits that since claim 26 recites the step of “providing one or more pre-translation text modification options” it is allowable over the art of record for at least the reasons given above for claim 1. Applicant respectfully requests withdrawal of the rejection to this claim. Applicant further requests the rejections as to claims 27, and 31-32 be withdrawn since this claim depends from independent claim 26, which is itself allowable over the art of record.

In regard to amended independent claim 39, Applicant submits that since claim 39 recites the element “means for displaying the original text on the browser and providing one or more pre-translation text modification options”, it is allowable over the art of record for at least the reasons give above for claim 1. Applicant respectfully requests withdrawal of the rejection to this claim. Applicant further requests the rejections as to claims 40 and 44 be withdrawn since this claim depends from independent claim 39, which is itself allowable over the art of record.

**Claim Rejections Under §103(a)**

The Action rejects claims 7-9, 13-15, 22-24, 28-30, 33-38, 41-43 and 45-52 as being unpatentable under 35 U.S.C. 103(a) over Brandon.

In regard to claims 7-9, 13-15, 22-24, 28-30, 41-43 and 45, Applicant traverses this rejection because each of these claims depends from independent claims 1, 11, 16, 26, or 39 which are patentable over the art of record for at least the reasons stated above. Applicant, therefore, respectfully requests the withdrawal of the rejection with respect to claims 7-9, 13-15, 22-24, 28-30, 41-43 and 45.

In regard to claims 33-38 and 46-52, Applicant traverses this rejection because Brandon does not teach every element of the claims as amended. Amended independent claims 33 and 46 both comprise the element "one or more pre-translation text modification options displayed on the e-mail message, wherein a user can modify the original text or the translated text using the one or more pre-translation text modification options," which, for at least the reasons given above in regard to claim 1, is not taught or suggested by Brandon. Applicant respectfully requests withdrawal of the rejection to this claim. Applicant further requests the rejections as to claims 34-38 and 47-52 be withdrawn since these claims depend from independent claim 33 and 46, which are themselves allowable over the art of record.

#### **Miscellaneous Claim Amendments**

Due to the claim amendments described above, several miscellaneous claim amendments were required to maintain consistency between the claims as well as between the claim language and terms. In making these miscellaneous claim amendments, Applicant believes that no new matter was added.

#### **CONCLUSION**

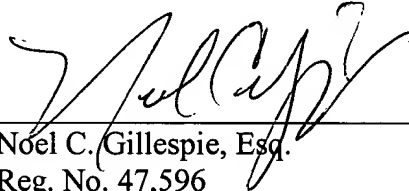
Based on the above remarks, Applicant believes that the claims are in condition for allowance and such is respectfully requested. After the above amendments, claims 1, 3-16, 18-52 are still pending in the application. Claims 2 and 17 have been cancelled. Thus, there are 50 total claims and 6 independent claims. Prior to this amendment, there were 52 total claims and 6 independent claims. Therefore, no fee is believed to be due for any of the added claims.

Because this response is being mailed within five months of the date of the Office Action, the fee for a two month extension is believed due with this response. Therefore, Check No. 1273 in the amount of \$225.00 is enclosed as payment for the two-month extension of time fee. No other fees are deemed necessary with the filing of this paper; however, the Commissioner is hereby authorized to charge any additional fees or credit any overpayments to Deposit Account No. **50-2613** (Order No. 39229.00003.UTL).

Respectfully Submitted,

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By: \_\_\_\_\_

  
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